Remarks

Entry of the above-noted amendments, reconsideration of the application, and allowance of all claims pending are respectfully requested. By this amendment, claims 1 and 13 are amended. These amendments to the claims constitute a bona fide attempt by applicants to advance prosecution of the application and obtain allowance of certain claims, and are in no way meant to acquiesce to the substance of the rejections. Support for the amendments can be found throughout the specification (e.g., page 3, line 15 to page 4, line 23, page 5, lines 9-15, and page 8, line 25 to page 9, line 28), drawings (e.g., FIGS. 1-3), and claims (e.g., previous claim 18). Claims 1, 3, and 5-26 are pending.

Allowable Subject Matter:

Claims 12-18 are allowed. Applicants gratefully acknowledge this indication of allowance.

Claim Rejections - 35 U.S.C. §§ 102 and 103:

Claims 1, 3, 5-6, and 13-17 are rejected under 35 U.S.C. §102(e) as being anticipated by Brown (U.S. Patent No. 6,226,356). Claims 7-12 and 25 are rejected under 35 U.S.C. §103(a) as being unpatentable over Brown in view of Heidari, et al. (U.S. Patent No. 6,512,739; "Heidari"). Claim 26 is rejected under 35 U.S.C. §103(a) as being unpatentable over Brown in view of Heidari, and further in view of Amrany, et al. (U.S. Patent No. 6,067,316; "Amrany"). These rejections are respectfully, but most strenuously, traversed.

It is well-settled that there is no anticipation unless (1) all the same elements are (2) found in exactly the same situation and (3) are united in the same way to (4) perform the

identical function. Since the applied reference is missing at least one element of each of applicants' independent claims, applicants respectfully submit that the claimed invention is not anticipated by the applied reference, as further discussed below.

Applicants respectfully submit that the applied references, with or without combination, assuming, *arguendo*, that the combination of the applied reference is proper, do not teach or suggest one or more elements of the claimed invention, as further discussed below.

For explanatory purposes, applicants discuss herein one or more differences between the applied references and the claimed invention with reference to one or more parts of the applied reference. This discussion, however, is in no way meant to acquiesce in any characterization that one or more parts of the applied references correspond to the claimed invention.

Applicants respectfully submit that the applied references do not teach or suggest one or more elements of the claimed invention. A careful reading of the applied reference fails to teach or suggest, for example, the multiple mode circuit that selects whether to support the POTS and asymmetric digital subscriber line services or whether to support the digital subscriber line services; wherein the multiple mode circuit receives a communication signal; wherein the multiple mode circuit separates and processes POTS signals and asymmetric digital subscriber line signals in the communication signal if POTS and asymmetric digital subscriber line services are being supported; wherein the multiple mode circuit separates and processes digital subscriber line signals in the communication signal if symmetric and asymmetric digital subscriber line services are being supported.

Brown (column 5, lines 55-56; and FIG. 3) discloses a line card for DSL and POTS:

> In the illustrated embodiment, the communications system 300 supports both a DSL system and Plain Old Telephone Service (POTS). Accordingly, the host interface 305 and the user interface 310 include POTS circuitry 315, 320 and DSL circuitry 118, 330, respectively. The host interface 305 can be a line card, for example, that supports both POTS and DSL technology. The DSL circuitry 118 may be circuitry for ADSL, IDSL, HDSL, or other digital subscriber line technology.

Brown discloses the line card that includes POTS circuitry and DSL circuitry. The Office Action's citation to Brown fails to disclose the line card selecting whether to support the POTS and ADSL services or whether to support DSL services. Simply missing from the Office Action's citation to Brown is any mention of the multiple mode circuit that selects whether to support the POTS and asymmetric digital subscriber line services or whether to support the digital subscriber line services; wherein the multiple mode circuit receives a communication signal; wherein the multiple mode circuit separates and processes POTS signals and asymmetric digital subscriber line signals in the communication signal if POTS and asymmetric digital subscriber line services are being supported; wherein the multiple mode circuit separates and processes digital subscriber line signals in the communication signal if symmetric and asymmetric digital subscriber line services are being supported.

So, the Office Action's citation to Brown fails to satisfy at least one of applicants' claim limitations.

The shortcomings of the Office Action's citation to Brown relative to certain elements of the claimed invention have been discussed above. The Office Action proposes a combination of the citation to Brown with a citation to Heidari. However, the Office Action's citation to Heidari does not overcome the deficiency of the Office Action's citation to Brown. Applicants respectfully submit that the proposed combination of the citation to Brown by the Office Action

with the citation to Heidari by the Office Action fails to provide the required configuration, assuming, *arguendo*, that the combination of the citation to Brown by the Office Action with the citation to Heidari by the Office Action is proper.

Heidari (column 4, lines 12-25, and FIG. 2) discloses a central office with splitters to dedicated line cards for voice band communications and selected line cards for xDSL communications:

> FIG. 2 depicts a more detailed view of a representative one of the central offices shown in FIG. 1 including both digital subscriber line access modules (DSLAMs) and PSTN voice band modules. The CO 100 includes subscriber line connections to subscribers 110-114. Subscriber line 262 couples subscriber 110 with the CO. Each of these connections terminates in the frame room 200 of the CO. From this room connections are made for each subscriber line via splitters and hybrids to both a DSLAM 202 and to the voice band racks 204. The splitter shunts voice band communication to dedicated line cards, e.g. line card 242 or to a voice band modem pool (not shown). The splitter shunts higher frequency xDSL communications on the subscriber line to a selected line card 210 within DSLAM 202.

Heidari discloses separate line cards for voice band communications (dedicated line card 242) and xDSL communications (selected line cards 210). The line card 242 of the voice band rack 204 receives voice band communications from the subscriber line 262. The line card 210 of the DSLAM 202 receives the xDSL communications from the subscriber line 262. The Office Action's citation to Heidari fails to disclose the line card selecting whether to support the POTS and ADSL services or whether to support DSL services. Simply missing from the Office Action's citation to Heidari is any mention of the line card comprising the multiple mode circuit capable of supporting symmetric and asymmetric telecommunication services, wherein the multiple mode circuit comprises the POTS interface for supporting POTS service and the xDSL interface for supporting symmetric and asymmetric xDSL services.

So, the Office Action's citation to Heidari fails to satisfy at least one of applicants' claim limitations.

The shortcomings of the Office Action's citation to Brown and Heidari relative to certain elements of the claimed invention have been discussed above. The Office Action proposes a combination of the citations to Brown and Heidari with a citation to Amrany. However, the Office Action's citation to Amrany does not overcome the deficiency of the Office Action's citations to Brown and Heidari. Applicants respectfully submit that the proposed combination of the citations to Brown and Heidari by the Office Action with the citation to Amrany by the Office Action fails to provide the required configuration, assuming, *arguendo*, that the combination of the citation to Brown and Heidari by the Office Action with the citation to Amrany by the Office Action is proper.

Amrany (column 5, lines 3-23) discloses a line card of a central office:

> Having described a very basic layout of the central office architecture, reference is now made to FIG. 3, which is a block diagram illustrating the circuitry that is common to a line card 40 of a central office 20, providing both POTS and xDSL communication services to an end user across a local loop 24. As illustrated, the local loop 24 is tapped to split off into two distinct channels, separated by a POTS filter 60. The first channel, or POTS channel 62, handles the lower frequency, voice-band transmissions, while the second, or xDSL channel 64, handles the higher frequency data transmissions. As is known, the POTS filter 60 serves to filter out higher frequency xDSL data signals from reaching the POTS channel 62. At the same time, the POTS filter 60 filters various higher frequency noise signals, that may otherwise be present in a transmitted POTS signal, from reaching the local loop 24. In the same way, a high pass filter 66 is provided near the interface of the xDSL channel 64 and the local loop 24. This high pass filter 66 is designed to filter out the lower frequency noise and POTS band transmissions, and therefore prevent them from reaching the operational circuitry of the xDSL channel 64.

Amrany discloses the line card with the POTS channel and the xDSL channel. The Office Action's citation to Amrany fails to disclose the line card selecting whether to support the

POTS and ADSL services or whether to support DSL services. Simply missing from the Office Action's citation to Amrany is any mention of the line card comprising the multiple mode circuit capable of supporting symmetric and asymmetric telecommunication services, wherein the multiple mode circuit comprises the POTS interface for supporting POTS service and the xDSL interface for supporting symmetric and asymmetric xDSL services.

Brown, Heidari, and Amrany all fail to meet at least one of applicants' claimed features. For example, there is no teaching or suggestion in Brown, Heidari, or Amrany of the line card comprising the multiple mode circuit capable of supporting symmetric and asymmetric telecommunication services, wherein the multiple mode circuit comprises the POTS interface for supporting POTS service and the xDSL interface for supporting symmetric and asymmetric xDSL services.

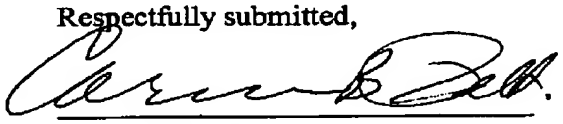
Furthermore, the Office Action does not allege that the art of record provides any teaching, suggestion, or incentive for modifying Heidari to provide the claimed configuration. Applicants respectfully submit that these documents fail to provide the express teaching, suggestion, or incentive, and the claimed invention is thus patentable over the art of record.

For all the above reasons, the independent claim presented herewith are believed neither anticipated nor obvious over the art of the record. The dependent claims are believed allowable for the same reasons as the independent claims, as well as for their own additional characterizations.

Withdrawal of the §§102 and 103 rejections is therefore respectfully requested.

In view of the above amendments and remarks, allowance of all claims pending is respectfully requested. If a telephone conference would be of assistance in advancing the prosecution of this application, the Examiner is invited to call applicants' attorney.

Respectfully submitted,



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